

November 15, 2010

California Air Resources Board  
1001 "I" Street  
Sacramento, Ca 95812

To: Members of the Board

The purpose of my letter is to protest the restrictions proposed to be placed on Special Purpose Lubricants in aerosol form.

Eveready Products is a contract filler of aerosol products that has been in business for almost 60 years. Many of the products we produce for our customers are custom formulated for and with our customers.

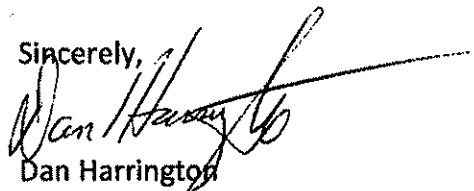
Special lubricants can include several different uses that are being lumped into one category. These products include very thick greases used on gears, anti-seize products, products used for food machinery or appliances, and many others. One product in particular was developed specifically for pintle hooks on semi-truck trailer couplings.

In all these products, the grease or lubricant is extremely thick and viscous. The aerosol tool works well with these products as long as we can use and find solvents that quickly evaporate once the product has been sprayed, thus leaving the original concentrate or lubricant developed for the particular use.

I have tried all available products that are not considered a volatile organic compound or are VOC exempt. None of the available solvents work well with the products I am dealing with. They are either too slow of an evaporator and leave the product wet and dripping off the target, or they are not soluble with the product.

I urge you to re-consider the proposal to reduce the VOC content of special purpose lubricants as this will be detrimental to the products I have mentioned as well as other products throughout the industry.

Sincerely,



Dan Harrington  
President

